



The Charlie Russell Back Country Horsemen have been helping maintain the CD trail for 22 years now. From Rogers pass to Flechers Pass has been our adopted trail and we take great pride in the good condition of the trail today. Our focus the past few years has been Rogers pass north to the Wilderness boundary.

Objection 1: Management of the Continental Divide National Scenic Trail from Roger's Pass to the Scapegoat Wilderness. The proposed Decision permits bicycle use along the CDNST from Roger's Pass to the Scapegoat Wilderness. North of Roger's Pass, between Lewis and Clark Pass and the Scapegoat Wilderness, the CDNST traverses the common boundary of Helena and Lewis and Clark National Forests, entering the Falls Creek Recommended Wilderness Area. The Lewis and Clark National Forest Plan governs the Falls Creek Recommended Wilderness Area, a U S Forest Service recommended addition to the Scapegoat Wilderness.

The proposed Decision errs in failing to limit bicycle use on the CDNST between Rogers Pass and the Scapegoat Wilderness. The Helena National Forest Plan (1986) provides forest wide management direction for the Continental Divide National Scenic Trail, directing that management of Continental Divide National

Scenic Trail (CDNST) on Helena National Forest follow the national CDNST comprehensive plan. CDNST direction will be incorporated” in the forest plan, including a more detailed analysis showing CDNST trail and area travel objectives.

The national CDNST comprehensive plan was revised through a multi year public process, signed by Chief Tidwell and published in the Federal Register/ Forest Service Manual in October 2009.

The Final revised Plan states:

The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor. (FSM 2353.42)

The comprehensive plan also states that “CDNST plans” ...”will be prepared in conjunction with travel management...” and directs area management of surrounding national forest lands to meet CDT plan goals:

Where possible, the CDNST will be located in primitive and semi-primitive non-motorized settings, which will contribute to providing for maximum outdoor recreational potential and conservation of natural, historic and cultural resources in the area traversed by the CDNST.

FSM 2353.44(b)

For “Recreation Resource Management,” the 2009 Continental Divide National Scenic Trail Comprehensive Plan provides the following direction for managing recreation uses on sections of the Continental Divide Trail: (2009 CDNST CP, page 15)

(1) Manage the CDNST to provide high-quality scenic, primitive hiking and pack and saddle stock opportunities. Backpacking, nature walking, day hiking, horseback riding, nature photography, mountain climbing, cross-country skiing, and snowshoeing are compatible with the nature and purposes of the CDNST.

The draft Decision does not propose to limit bicycles anywhere on the CDNST. Between Rogers Pass and the Scapegoat Wilderness.

the CDNST follows the Continental Divide which forms a common boundary with the Lewis and Clark National Forest (LCNF), traversing into the Falls Creek Recommended Wilderness.

Under LCNF forest plan guidance, trails within the Falls Creek Recommended Wilderness are managed for foot and stock use only.

While we support shared bicycle use on much of the CDNST, mountain bike use on the CDNST between Rogers Pass and the Scapegoat Wilderness is not consistent with the Lewis and Clark National Forest Plan and the 2009 CDNST Comprehensive Plan. This oversight merits correction in the Final Decision.

The primary recreation purposes of the CDNST are for high quality hiking, horseback riding, backpacking, snowshoeing, skiing, etc. Allowance of motorized use on the CDNST is contrary to the purpose of its designation. Bicycle use (non-motorized) may be allowed on segments of the CDNST where bike use is consistent with the applicable land and resource management plan (forest plan) and does not conflict with the nature and purposes of the CDNST.

There is no boundary marker along CD trail letting anyone know where the Scapegoat Wilderness starts.

As a proposed remedy, we have significantly narrowed our specific request to allow foot and stock use only from Rogers Pass to the Scapegoat Wilderness; Mountain Bike is more suitable south of Rogers Pass

Proposed Remedy: Manage the CDNST from Rogers Pass to Scapegoat Wilderness for Foot and Stock Travel Only. This travel plan is the right vehicle to establish where mountain bike use is appropriate on the CDNST, as directed by the 2009 CDNST Comprehensive Plan. Charlie Russell BCH is aware of the collaboration between MWA and MHDT although not directly involved. , Charlie Russell will accept and respectfully request foot and stock uses only on the CDNST from Rogers pass North.

Incorporating the Proposed Remedy into the Final means that from Rogers Pass South on the CDNST would be available for mountain bike use, while the northernmost from Rogers Pass North to the Scapegoat Wilderness would be managed for foot and stock use only. Foot and stock uses are the primary uses of this section of the CDT.

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The proposed remedy improves the Final Decision in the following ways:

1. Is consistent with Lewis and Clark National Forest Plan and Travel Plan.
2. Follows Recreation Management Direction of the 2009 Continental Divide National Scenic Trail Comprehensive Plan, as required in Helena Forest Plan.
3. Prevents potential conflicts and safety issues on traditional foot and pack stock trail sections that is also a wilderness portal trail.
4. Provides a balanced approach to use of CDNST endorsed by MWA and Montana High Divide Trails Partners including mountain bikers, equestrians and hikers.
5. Rogers Pass is a more practical, accessible and identifiable point on the CDNST than the draft proposal to make the transition from foot, stock and bicycles to foot and stock use.

Sincerely,

Steve Wadsworth

President Charlie Russell Back Country Horsemen